

Grant County Broadcasters, Incorporated, licensee of station WNKR (FM) at Williamstown, Kentucky opposes the Petition For Rulemaking of The National Association of Broadcasters to Permit AM stations' use of FM Translators filed with the Commission on July 14, 2006, and hereby submits the following comments on that petition:

AM is radio's oldest service. As the oldest technology it is subject to greater atmospheric interference, higher noise levels and lower audio fidelity than FM radio. The phenomenon of skywave propagation means that **no AM radio station has nighttime coverage that is identical to its daytime coverage**. This is an inescapable fact of life on the AM dial, and every AM broadcaster since the 1920's has known that this is the case with all AM radio stations. It is inherent in the medium, and has traditionally been regarded by the Commission and by broadcasters as a limitation to be accepted rather than a problem to be solved.

Over the years many AM stations that formerly would have been daytime only stations have been granted low power (or low power directional) nighttime authorizations as the rules concerning AM night service were relaxed. Most of these stations were founded knowing that they would have no nighttime license at all or one with very limited coverage. They were built anyway, knowing this limitation. Suddenly, the NAB seeks to create substantial signal entitlement for all AM stations *on the FM dial*. This is proposed as a remedy for technical limitations that have existed over the entire life of most of the stations in question, and are inherent in the medium itself. The NAB makes this proposal despite the fact that there is no technical or legal precedent for the proposed guarantee of coverage at night that is equal to coverage during the day on AM.

The NAB proposal is flawed. It proposes an entitlement for AM broadcasters of nighttime coverage (through FM translators) equal to the station's 2mV/m daytime coverage area or within a 25-mile radius of their transmitter site. Incredibly, they seek this new entitlement for any and all AM stations, from the most powerful down to the smallest. Indeed, the NAB cites a need for translator help for 50,000 watt WSM because of an underground traffic sensor near Nashville. The concept of this 50,000-watt station being a needy candidate for signal help is remarkable. The reality is that WSM has one of the finest AM signals in the entire country, and one that has coverage at night that is superior to its coverage during the day.

No broadcast signal is perfect. Many existing FM stations also have signal problems in certain areas- ours included. Most of those signal problems are not fixed by translators because of the cost and because a listener would have to re-tune their receivers in the area served by the translators. This has traditionally been seen as the major disadvantage of translators.

On the other hand, this proposal is likely to open the translator floodgates. The NAB proposal would allow the creation of mini-FM translator networks within the daytime coverage area of virtually every AM station. It could potentially turn every AM station into a quasi- FM station. The additional benefits of FM besides coverage (high FM

penetration rates in most markets, high fidelity music transmission, lower noise, and a stereo system with an existing receiver base in place) are powerful incentives for AM broadcasters to clog both the FM dial and the Commission with translators and translator applications. AM stations that were purchased or started with their signal limitations after sunset well known by their owners would automatically become entitled to use FM translators to achieve coverage equal to their daytime signals, also contributing to a flood of translator applications as these licensees use translators as a means of instantly increasing their station's value.

The NAB petition states (albeit very briefly) that this proposal is designed to "provide full interference protection to existing FM service". The fact that this is covered in one short sentence (with no specificity) deserves the Commission's full attention. Adoption of this proposal by the Commission will likely result in applications for thousands of additional translator stations on the FM dial. We have grave doubts that this great number of additional translators can be accommodated without interference or other problems to existing and proposed FM services.

Practically speaking, we have doubts that the public will use the proposed service to any great extent. Consider the current reality in a car when using an FM translator to help a coverage problem with an existing FM station. The listener must know the translator exists, what small area it serves and **where it is located on the FM dial**. The listener must then change to the translator signal to "fill in the hole" in coverage, then go back to the primary signal once the area covered by the translator has been driven through.

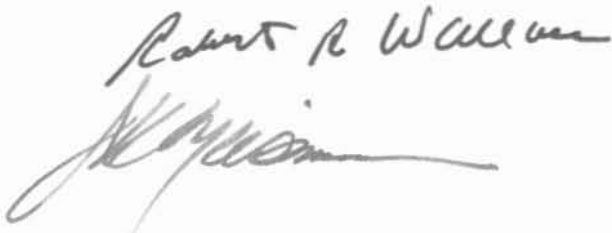
Realistically, translators are most effective in homes or offices where the receiver is stationary, but even then a second dial position must be known and embraced by the listener. The NAB proposal adds to this the need to change bands from AM to FM as one drives an automobile or at the sunset sign-off or power drop of the AM station. This is asking a lot of a listener. Common sense dictates that few will embrace this laborious "solution" to bad AM reception- especially in moving traffic.

Clearly, this proposal takes the problems caused by AM propagation and the inherent limitations of the medium and "solves" them by cluttering up the FM dial, possibly degrading that service in the process. As an FM broadcaster, we don't see this as forward progress.

If AM radio has truly reached the point where the entire band cannot compete and needs this kind of drastic relief, it is time to look at establishing a digital replacement service for AM radio and sun-setting the existing medium wave service. This is a far better solution than thousands of translators established at the expense of healthy FM stations.

We ask that the Commission reject this proposal.

Respectfully Submitted,

A handwritten signature in dark ink, appearing to read "Robert R. Wallace". The signature is fluid and cursive, with a long horizontal stroke at the end.

Robert R. Wallace
Jeffrey K. Ziesmann
Grant County Broadcasters, Inc.
Radio Station WNKR (FM)
118 South Main Street
Dry Ridge, Kentucky 41035